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July 14, 2025

**Via ECF**

Hon. Zahid N. Quraishi  
United States District Judge  
Clarkson S. Fisher Federal Building &  
United States Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *Conforti v. Hanlon*, Civil Action No. 3:20-cv-08267-ZNQ-TJB  
*Kim v. Hanlon*, Civil Action No. 3:24-cv-01098-ZNQ-TJB**

**Request for Oral Argument on Motions for Reconsideration**

Dear Judge Quraishi:

Pursuant to Local Civil Rule 78.1(b), Plaintiffs respectfully request that the Court hear oral argument on Plaintiffs' and Defendants' Motions for Reconsideration (Kim ECF Nos. 324, 325; Conforti ECF Nos. 256, 257), both of which are currently returnable on July 21, 2025.

We believe that oral argument would aid the Court in addressing the complex and interrelated legal issues arising in *Conforti* and *Kim*. These include the questions of the ability of Plaintiffs to obtain final relief following a determination that its claims are not moot, the procedural options for proceeding with the case in light of the New Ballot Design Law, P.L. 2025, c.32, mootness and its exceptions, and the *Friends of the Earth* doctrine, its progeny, and its application to these facts. These issues involve nuanced constitutional and statutory interpretation and interplay with one another and would benefit from elaboration by counsel and by clarifying questions from the Court.

I am authorized to state that counsel for Bergen and Hudson Counties both join in this request.

If the Court grants this request, I am available to work with Chambers to coordinate all scheduling with opposing counsel.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

WEISSMAN & MINTZ LLC

BROMBERG LAW LLC

/s/ Brett M. Pugach

Brett M. Pugach

/s/ Yael Bromberg

Yael Bromberg

/s/ Flavio L. Komuves

Flavio L. Komuves

cc: All Counsel (via ECF)

The parties' request for oral argument is hereby  
**DENIED**. The Motions for Reconsideration will be  
decided on the papers in due course.

**So Ordered** this **14th day of July 2025**.

s/ Zahid N. Quraishi

**ZAHID N. QURAISHI**

**UNITED STATES DISTRICT JUDGE**